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Rocky Flats Office

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Closure Plans for IHSS's 206 (Inactive D-836 Hazardous Waste Tank) and 208 (Inactive 444/447 Waste Storage Area)

J M Kersh, Associate General Manager Environmental Restoration and Waste Management EG&G Rocky Flats, Inc

This memorandum serves to inform EG&G that IHSSs 206 and 208 may require Closure Plans to be prepared per 40CFR Part 265 Subpart G or the equivalent under the Colorado Hazardous Waste Act.

The Draft Final Phase I RFI/RI Work Plan, Other Outside Closures (Operable Unit 10), references the 1987 RCRA Part B Permit Application prepared by Rockwell International From a phone conversation with Mr Allen Schubert, EG&G, on December 5, 1991, Bruce Thatcher of my staff learned that IHSSs 206 and 208 were removed from the Part B Permit Application since there were no plans to utilize these facilities in the future. Thus, it is likely that the closure of these storage units is currently not covered by either a closure plan or by incorporation in the RCRA Part B permit.

We request that a determination be made whether the closure of IHSSs 206 and 208 are covered by either a closure plan or incorporation in a RCRA Part B Permit Application If they are not, appropriate actions should be taken so that the closures are documented as required by RCRA and the Colorado Hazardous Waste Act. A response to this request indicating the status of the closure of these units and the proposed actions should be received by DOE/RFO/ERD no later than January 3, 1992

Questions regarding this memorandum should be directed to Bruce Thatcher of my staff at ext 3532

David P Simonson Assistant Manager

for Environmental Management

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Reviewed for Addressee Corres Control RFP 12-11-91

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cc (see page 2)

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